Policy on Corporate Disclosures

Revision history				
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1. Definitions and Abbreviations

Unless otherwise defined or the context otherwise requires, all capitalized terms used in this Policy shall have the following meanings.

Applicable Laws	means all applicable statutes, laws, ordinances, rules and regulations, including but not limited to the Listing Rules, SEC Act and the Companies Act, in each case as in effect from time to time;
Board	means the Board of Directors of the Company;
Companies Act	means the Companies Act No. 7 of 2007;
Company	means Laugfs Gas PLC and Laugfs Power PLC
Personnel	means all directors, consultants, management, officers and employees (including permanent, probation, temporary or contract staff) of the Company, and individuals (including trainees, seconded staff, casual workers, agency staff, interns);
CSE	means the Colombo Stock Exchange;
Listing Rules	means the Listing Rules of the Colombo Stock Exchange;
Policy	means this Policy on Corporate Disclosures;

2. Introduction

This Policy outlines the Company's commitment to transparency and accuracy in communicating material information to stakeholders. It establishes guidelines for timely disclosures that comply with Applicable Laws, aiming to foster trust and informed decision-making among investors, regulators, employees, and the public.

3. Scope

This Policy is applicable to all Personnel, irrespective of their seniority or role within the organization. It encompasses all activities related to the preparation, review, approval, and dissemination of information that could reasonably be considered material to investors, regulators, employees, or other stakeholders.

4. Related Policies

This Policy should be read in conjunction with the other policies, key documents, and guidelines of the Company, including the following:

- Policy on Relations with Shareholders and Investors;
- Policy on Whistleblowing;

5. Disclosure Principles

- (a) Materiality: Information is considered material if its omission or misstatement could influence the economic decisions of stakeholders. Materiality should be assessed from both quantitative and qualitative perspectives, considering the potential impact on the Company's financial condition, operating results, or business prospects and in line with Applicable Laws.
- (b) Accuracy and Integrity: All disclosures must be accurate, complete, and not misleading. Information should be presented in a clear, concise, and understandable manner, using consistent and appropriate accounting principles.

- (c) Timeliness: Disclosures must be made in a timely manner to ensure that stakeholders have access to relevant information promptly as required under Applicable Laws. Delays in disclosure should be avoided except where permitted under Applicable Laws.
- (d) Fairness: The Company will ensure fair and equal access to information for all stakeholders. Selective disclosure of material information to certain individuals or groups without simultaneous disclosure to the public is prohibited, except where legally permitted (e.g., confidential negotiations).
- (e) Confidentiality: Information that could reasonably be expected to affect the Company's share price or investment decisions should be treated as confidential until disclosed to the public. Personnel must adhere to strict confidentiality protocols to prevent unauthorized disclosure of material non-public information.

6. Types of Disclosures

- (a) Financial Disclosures: The Company will disclose quarterly and annual financial statements, in accordance with Applicable Laws and accounting standards.
- (b) Non-Financial Disclosures: The Company will disclose material non-financial information, including significant operational developments, strategic initiatives, risks, legal proceedings, and governance matters that could impact stakeholders' perceptions or decisions in accordance with Applicable Laws.
- (c) Press Releases and Media Communications: All press releases and media communications concerning material information must be reviewed and approved by authorized Personnel in compliance with this Policy.
- (d) Regulatory Filings: The Company will file timely and accurate reports with CSE, including annual reports including prescribed disclosures, quarterly filings, and other required disclosures, in accordance with Applicable Laws.

7. Internal Controls and Training

The Company will maintain internal controls and procedures designed to ensure compliance with this Policy, including mechanisms for identifying material information, assessing materiality, reviewing disclosures, and monitoring compliance with disclosure obligations.

This Policy will be presented to all Personnel, and as needed subsequently. Personnel will receive training or other communication activities on the importance of accurate and timely disclosures, and their responsibilities under this Policy, depending on their functions.

8. Compliance and Enforcement

The Board shall regularly monitor compliance with this Policy and relevant Applicable Laws, including the review and approval of significant disclosures.

Non-compliance with this Policy may result in disciplinary action, including termination of employment or other appropriate measures, in accordance with Company policies and Applicable Laws. Personnel who have concerns about potential violations of this Policy or improper disclosure practices are encouraged to report such concerns through established whistleblower channels without fear of retaliation.

9. Reviews

This Policy and related procedures will be reviewed at least annually, or more frequently if required, by the Board to:

- ensure they remain effective and relevant to the Company;
- ensure that they continue to comply with Applicable Laws and industry standards;
- determine if any changes are required.